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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: July 8, 2019

REPLY TO ATTN OF: EP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-717)

TO: William Merriam
Forester – TFBV-3

Proposed Action: Vegetation Management along the Lane-Wendson No.1 Transmission Line Corridor

Pollution Prevention and Abatement Project No.: 2698

Location: Lane County, Oregon

Description of the Proposal: To comply with Western Electricity Coordinating Council standards, BPA proposes to manage hazardous vegetation adjacent to the Lane-Wendson No.1 transmission line corridor from Lane Substation to Walton Substation. The corridor is shared by the 115-kilovolt (kV) Lane-Wendson No.1 and 230-kV Lane-Wendson No. 2 transmission lines, and crosses approximately 20 miles of terrain through rural residential, agricultural, commercial forestry, Oregon Department of Forestry, and United States Bureau of Land Management lands.

BPA proposes to remove up to 760 danger trees, and side-limb up to 172 trees that are currently or will soon become a hazard to the transmission line (a hazard is defined as one or more branches, tops, and/or whole trees that could fall or grow into the minimum safety zone of the transmission line(s) causing an electrical arc, relay and/or outage). The overall goal of BPA is to establish low-growing plant communities along the ROW to control the development of potentially threatening vegetation. Work would be completed by late fall of 2019; however, additional vegetation management may be necessary where BPA personnel discover vegetation that poses a hazard to the transmission line.

Tree cutting and limbing would be performed by qualified personnel using conventional logging machinery and chainsaws. Where requested by the landowner, trees would be removed from the property using conventional logging practices, including skidders, cable yarding, and/or helicopter operations. No new roads would be created; however, minor vegetation clearing may be needed to create log skid paths, landings, and log decks. All other trees and debris would be disposed of on site, along the ROW, using cut, lop and scatter, or mulching techniques.

On-site meetings, emails, and phone calls would be used to notify landowners prior to commencing vegetation management activities. Any additional measures proposed by landowners or land managers through ongoing communication would be incorporated into the work plan, if possible, during project implementation.

Analysis: Vegetation data were collected along the ROW corridor using LiDAR, then analyzed with specialized software. A tree list was created by field-verification, and those trees were individually marked to be removed or side-limbed in accordance with requirements identified in BPA's Transmission System Vegetation Management Program FEIS (DOE/EIS-0285, May 2000) and Record of Decision (August 23, 2000). The following summarizes natural resources occurring in the project area along with applicable mitigation measures outlined in a project-specific mitigation implementation table (MIT) created for the Lane-Wendson No. 1 Transmission Line Rebuild Project (Rebuild Project).

Water Resources: Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are noted in the MIT. No ground-disturbing vegetation management methods would take place within 100 feet of streams, thus minimizing the risk for soil erosion and sedimentation near the streams. In addition, erosion and sedimentation would be addressed by best management practices (BMPs) prescribed by the Rebuild Project's stormwater pollution prevention plan (SWPPP).

Endangered Species Act and Magnuson-Stevens Act: BPA's proposed tree removal activities were described in the Endangered Species Act (ESA) consultation with the United States Fish and Wildlife Service (USFWS), for the Rebuild Project. A Letter of Concurrence/Biological Opinion was issued on July 23, 2015; however, the number of trees to be cut increased later. The potential impacts to ESA-listed species from cutting the additional trees were considered, and it was determined that removal of the additional trees would not change BPA's original determination of effect, and re-initiation of consultation was not needed. Conservation measures for impacted species are listed in the MIT.

BPA conducted a review of ESA-listed species and Essential Fish Habitat (EFH) (as defined by the Magnuson-Stevens Act), under the jurisdiction of the National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS). None of the 760 danger trees, or the 172 trees to be limbed, are within 100 ft. of streams containing ESA-listed fish species or EFH; thus, the proposed tree removal activities would have "No Effect" on ESA-listed fish species or EFH under the jurisdiction of NMFS.

Cultural Resources: Tree removal activities associated with the Rebuild Project were described in Section 106 Consultation with the State and Tribes. No sensitive cultural sites were documented in the project area of the tree removal activities. If a site is discovered during the course of vegetation control, work would be stopped in the vicinity and the BPA Environmental Specialist and the BPA archeologist would be contacted.

Re-Vegetation: Existing naturalized grasses and woody shrubs are present on the entire ROW and are expected to naturally seed into the areas that would have lightly-disturbed soil. Areas that are more heavily disturbed would be managed according to the MIT and SWPPP until sufficient ground cover is observed.

Monitoring: The entire project would be inspected during the work period, fall 2019. A third-party Quality Assurance Inspector, hired by BPA, would monitor tree removal activities.

Findings: This Supplement Analysis finds that: (1) the proposed actions are substantially consistent with the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) and ROD, and; (2) there are no new circumstances or information relevant to environmental concerns and bearing on the proposed actions or their impacts. Therefore, no further NEPA documentation is required.

/s/ Oden Jahn
Oden W. Jahn
Environmental Scientist

CONCUR: /s/ *Sarah T. Biegel* DATE: *July 8, 2019*
Sarah T. Biegel
NEPA Compliance Officer

References:
Tree List

bcc:
J. Sharpe – EP-4
B. Sherer – EP-4
S. Hugill – EPI-4
M. Colletti – EPR-4
P. Smith – EPR-4
H. Adams – LC-7
K. Hinick – NSSV-4400-2
J. Semrau – TELF-ALVEY
S. Billings – TERR-ALVEY
J. Flansburg – TFHQ-TPP-3
Official File – EP (EQ-13)

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